

Teresa A. Robinson
9 Wragby Court
Perry Hall, MD 21128

September 15, 1999

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Food and Drug Administration
Dockets Management Branch (HFA-305)
5630 Fishers Lane, Room 1061
Rockville, MD 20852

To Whom It May Concern:

Re: Docket Numbers: 98N-1230
96P-0418
97P-0197

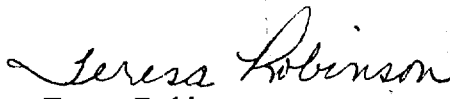
I am writing in response to your request for public comments regarding the reduction of egg-borne diseases. It is my belief that the FDA must do more than simply put bacteria warning labels on egg cartons and regulate egg refrigeration temperatures to protect the American public.

To seriously combat egg-borne diseases, the FDA must also prohibit the practice of forced molting of hens. Force molting is a common practice the U.S. egg industry employs to manipulate egg production by starving hens for up to 14 days. This practice promotes disease by destroying the starving hens' immune system.

The US Dept of Agriculture's Food Safety & Inspection Service (FSIS) asserts: "FSIS recognizes that public health concerns are raised by highly stressful forced molting practices. For example, extended starvation and water deprivation practices lead to increased shedding of Salmonella enteritidis by laying hens subjected to these practices."

The FDA has the authority to ban farm practices that injure human health. Further, the FDA was petitioned to ban forced molting in April 1998. Since evidence indicates that the practice of forced molting is the cause of infectious diseases in hens and eggs that ultimately compromises the health of consumers I urge you to grant this petition without further delay.

Sincerely,


Teresa Robinson

96P-0418

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20852/0001

HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION
CROSS REFERENCE SHEET

Docket Number/Item Code: 98N-1230/C628

See Docket Number/Item Code: 97P-0197/C629
96P-0418/C628